

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.	
v.	:	DATE FILED:	
LUZERNE FAULKNER CARL CRAWFORD	:	VIOLATIONS:	18 U.S.C. § 2113(d) (Armed bank robbery - 1 Count)
	:		
	:		18 U.S.C. § 924(c) (Using and carrying a firearm during a crime of violence - 1 Count)
	:		
	:		18 U.S.C. § 922(g) (Felon in possession of a firearm - 2 Counts)
	:		
	:		21 U.S.C. § 841(a)(1) (Possession with intent to distribute cocaine base ("crack") - 1 Count)
	:		
	:		18 U.S.C. § 2 (Aiding and Abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 16, 2003, in the Eastern District of Pennsylvania, defendants

LUZERNE FAULKNER and
CARL CRAWFORD

knowingly and unlawfully, by force and violence, and by intimidation, took from, and aided and abetted in the taking from, employees of the Commonwealth Bank, 6537 Castor Avenue, Philadelphia, Pennsylvania (hereafter “the Bank”), lawful currency of the United States, that is, approximately \$136,100, belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants LUZERNE FAULKNER and CARL CRAWFORD knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Bank, and other persons, by use of dangerous weapons, that is, two firearms.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 16, 2003, in the Eastern District of Pennsylvania, defendants

LUZERNE FAULKNER and
CARL CRAWFORD

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, two handguns, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, the bank robbery of the Commonwealth Bank, 6537 Castor Avenue, Philadelphia, Pennsylvania, as charged in Count One of this indictment.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 16, 2003, in the Eastern District of Pennsylvania, defendant

LUZERNE FAULKNER,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce three firearms, that is, a SKS Norinco 7.62 x .39 caliber assault rifle, serial number 220-2656, a .9mm Glock, model 26, semiautomatic pistol, serial number DSB168, loaded with approximately eight live rounds of ammunition, and a Phoenix Arms Raven .25 caliber semiautomatic pistol, serial number 3214998, loaded with one live round of ammunition and other ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2003, in the Eastern District of Pennsylvania, defendant

CARL CRAWFORD,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Browning .380 caliber semiautomatic pistol, serial number 05559, loaded with two live rounds of ammunition and other ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2003, in the Eastern District of Pennsylvania, defendant

CARL CRAWFORD,

knowingly and intentionally possessed with intent to distribute in excess of 50 grams, that is, approximately 80 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 922(g) and 924(c), set forth in Counts Two, Three and Four of this Indictment, the defendants

LUZERNE FAULKNER and
CARL CRAWFORD

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- a. one SKS Norinco 7.62 x .39 caliber assault rifle, serial number 220-2656;
- b. one .9mm Glock, model 26, semiautomatic pistol, serial number DSB168, loaded with approximately eight live rounds of ammunition;
- c. one Phoenix Arms Raven .25 caliber semiautomatic pistol, serial number 3214998, loaded with one live round of ammunition; and
- d. one Browning .380 caliber semiautomatic pistol, serial number 05559, loaded with two live rounds of ammunition.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney